

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

SONYA LARSON,

Plaintiff

v.

DAWN DORLAND PERRY,  
COHEN BUSINESS LAW GROUP, PC and  
JEFFREY A. COHEN, ESQUIRE,

Defendants.

AND

DAWN DORLAND PERRY

Plaintiff-in-Counterclaim

v.

SONYA LARSON

Defendant-in-Counterclaim

C. A. No.: 1:19-CV-10203-IT

**DAWN DORLAND PERRY'S MOTION TO AMEND RESTATED COUNTERCLAIM**

Plaintiff-in-Counterclaim Dawn Dorland Perry, known professional and artistically as Dawn Dorland (“Ms. Dorland”), respectfully moves this Court to permit Ms. Dorland to amend her Restated Counterclaims Asserted Against Sonya Larson, filed on September 8, 2020 [Dkt. No. 96]. Through the course of discovery in this matter, Ms. Dorland has learned that Defendant Sonya Larson (“Ms. Larson”) filed her original Complaint in this matter knowing that she had plagiarized from Ms. Dorland’s prior published material, thereby demonstrating full awareness that her tort claims were entirely meritless. Additionally, text messages sent by Ms. Larson demonstrate that Ms. Larson’s objective in bringing this suit was not vindication of her rights or

to recover damages which she believed she was rightfully owed, but instead that her objective was to coerce Ms. Dorland to leave Ms. Larson alone and for Ms. Dorland to abandon her valid claims to Ms. Dorland's own intellectual property.

Ms. Larson's improper purpose in commencing the instant litigation, and her attempts to coerce Ms. Dorland into abandoning her rights through imposition of costly litigation, are an abuse of the process which the Court system is intended to accomplish. Accordingly, Ms. Dorland seeks to amend her Counterclaim in this matter to include a claim for Abuse of Process.

The accompanying Memorandum of Law is hereby incorporated by reference.

**CERTIFICATE PURSUANT TO LOCAL RULES 7.1 and 37.1**

I, Suzanne M. Elovecky, do hereby certify that, pursuant to Local Rule 7.1(a)(2), I have conferred with counsel for the Plaintiff in an attempt to resolve or narrow the issues raised by the foregoing motion and have been unsuccessful. Said conference took place by telephone at 3:30 p.m. on January 19, 2022. The parties did not narrow their areas of disagreement during the call, although counsel for Sonya Larson requested additional time to file an opposition, and counsel for Dawn Dorland agreed to cooperate fully with any such requested attention, including through assent to such a motion in acceptable form.

Respectfully submitted,

DAWN DORLAND PERRY,

By her attorneys,

/s/ Suzanne Elovecky

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**CERTIFICATE OF SERVICE**

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on January 20, 2022.

/s/ Suzanne M. Elovecky

Suzanne M. Elovecky (BBO #670047)